

EXHIBIT C

<p style="text-align: right;">Page 18</p> <p>1 affairs.</p> <p>2 What is -- what would you -- how</p> <p>3 would you describe the advocacy portion of your</p> <p>4 work?</p> <p>5 A. Advocacy is kind of a standard</p> <p>6 term that's used in all government operations.</p> <p>7 I mean, everybody has an advocacy to represent</p> <p>8 them with legislators as they work on the laws,</p> <p>9 making the laws that govern our country and our</p> <p>10 business and our personal lives, and so advocacy</p> <p>11 means we educate.</p> <p>12 Q. So in the legal field we use the</p> <p>13 term advocate as well, and when I'm an advocate</p> <p>14 for my client, I'm working on behalf of my</p> <p>15 client, like for my client's interests.</p> <p>16 Do that make sense?</p> <p>17 A. Yes.</p> <p>18 Q. Is that the same way that the</p> <p>19 word is used in your work?</p> <p>20 MR. NICHOLAS: Object to the</p> <p>21 form.</p> <p>22 THE WITNESS: Well, we represent</p> <p>23 our company and help educate, as I said,</p> <p>24 policy makers so they understand our</p>	<p style="text-align: right;">Page 20</p> <p>1 form.</p> <p>2 BY MR. CLUFF:</p> <p>3 Q. That's another admonition I</p> <p>4 forgot to give, I'm sorry. So we have a video</p> <p>5 recording happening today, and we're also going</p> <p>6 to get a transcription of everything that's</p> <p>7 said, and so in order to get a clean record, a</p> <p>8 clean written record, it's important that you</p> <p>9 and I and Bob all let each other have a chance</p> <p>10 to finish our questions and answers. So after I</p> <p>11 ask you a question, give Bob a second or two or</p> <p>12 your counsel a second or two to interpose any</p> <p>13 objections that he might have.</p> <p>14 A. Okay.</p> <p>15 Q. I'll do my best to give you the</p> <p>16 same courtesy and let you finish your answers</p> <p>17 before I ask another question.</p> <p>18 A. Okay. Veterinarians are our</p> <p>19 customers too.</p> <p>20 Q. Okay. So that's -- veterinarians</p> <p>21 would be included in the list of customers that</p> <p>22 AmerisourceBergen works with, okay.</p> <p>23 Earlier you mentioned that part</p> <p>24 of your work, in addition to advocacy, was</p>
<p style="text-align: right;">Page 19</p> <p>1 business and some of the complexities of</p> <p>2 our business.</p> <p>3 BY MR. CLUFF:</p> <p>4 Q. And when you say your business,</p> <p>5 you refer to AmerisourceBergen, correct?</p> <p>6 A. Yes, AmerisourceBergen.</p> <p>7 Q. So in your work when you're</p> <p>8 advocating, you're advocating for policies that</p> <p>9 are supported by AmerisourceBergen?</p> <p>10 MR. NICHOLAS: Object to the</p> <p>11 form.</p> <p>12 THE WITNESS: Generally or our</p> <p>13 customers.</p> <p>14 BY MR. CLUFF:</p> <p>15 Q. Who are AmerisourceBergen's</p> <p>16 customers?</p> <p>17 A. Pharmacists, hospitals,</p> <p>18 manufacturers, patients. I mean, we serve</p> <p>19 everybody who receives pharmaceuticals.</p> <p>20 Q. So one of the things that you're</p> <p>21 doing in your work is advocating on behalf of</p> <p>22 AmerisourceBergen's customers as well?</p> <p>23 A. Yes.</p> <p>24 MR. NICHOLAS: Object to the</p>	<p style="text-align: right;">Page 21</p> <p>1 educating AmerisourceBergen's associates.</p> <p>2 How does your work involve</p> <p>3 educating AmerisourceBergen's associates?</p> <p>4 A. So we develop e-mails and we have</p> <p>5 in our company website a link so that they can</p> <p>6 learn about --</p> <p>7 MR. CLUFF: Hold on one second.</p> <p>8 Could we turn the phones off, please.</p> <p>9 THE WITNESS: So that they can</p> <p>10 get updated and have information about</p> <p>11 policies that impact our business and</p> <p>12 our customers.</p> <p>13 BY MR. CLUFF:</p> <p>14 Q. Does your office ever do any</p> <p>15 in-person training with AmerisourceBergen</p> <p>16 associates?</p> <p>17 A. No.</p> <p>18 Q. Have you ever conducted any</p> <p>19 webinars or seminars with AmerisourceBergen</p> <p>20 associates?</p> <p>21 A. In a limited sense.</p> <p>22 Q. How so?</p> <p>23 A. Well, we don't participate in</p> <p>24 company-wide type educational like our HR</p>

<p style="text-align: right;">Page 22</p> <p>1 department, for example. We just have set our 2 asset times to provide updates on issues that we 3 provide for interested associates. 4 Q. When you use the word 5 "associates," were you referring to sort of rank 6 and file AmerisourceBergen associates or anybody 7 employed by AmerisourceBergen? 8 A. Anybody employed by 9 AmerisourceBergen. AmerisourceBergen refers 10 their employees as associates. 11 Q. Understood. Thank you for the 12 clarification. 13 So in educating 14 AmerisourceBergen's associates then, you would 15 have been responsible for educating people like 16 Steven Collis? 17 MR. NICHOLAS: Object to the 18 form. 19 THE WITNESS: Yes. 20 BY MR. CLUFF: 21 Q. How about AmerisourceBergen's 22 Executive Committee? 23 A. Yes. 24 Q. You also referred to advocacy and</p>	<p style="text-align: right;">Page 24</p> <p>1 associates who live and work at these 2 operations are constituents, so elected 3 official considers the business 4 operations in their districts to be 5 constituents. 6 BY MR. CLUFF: 7 Q. Does AmerisourceBergen make 8 campaign contributions to the elected officials 9 where it does business? 10 MR. NICHOLAS: Object to the 11 form. 12 Go ahead. 13 THE WITNESS: Corporate 14 contributions? 15 BY MR. CLUFF: 16 Q. Yeah. 17 A. So we do, in a very limited 18 situations for states that do not accept PAC 19 contributions, we do make small, limited 20 corporate contributions, but it's a very nominal 21 amount. 22 Q. AmerisourceBergen then also makes 23 contributions through a PAC? 24 A. Yes.</p>
<p style="text-align: right;">Page 23</p> <p>1 educating AmerisourceBergen's associates as well 2 as its elected officials. 3 What did you mean by 4 AmerisourceBergen's elected officials? 5 A. So we have operations throughout 6 the country because we distribute 7 pharmaceuticals anywhere in the country within 8 12 hours. So we are constituents of many 9 elected officials around the country. So as 10 their constituent, we -- they look to us to help 11 them understand, sometimes visit our businesses. 12 Q. AmerisourceBergen can't vote in 13 elections, can it? 14 MR. NICHOLAS: Object to the 15 form. 16 THE WITNESS: As a company? 17 BY MR. CLUFF: 18 Q. Mm-hmm. 19 A. No. 20 Q. Okay. So how are you a 21 constituent of an elected official? 22 MR. NICHOLAS: Object to the 23 form. 24 THE WITNESS: Well, the</p>	<p style="text-align: right;">Page 25</p> <p>1 Q. And what does a PAC stand for, 2 just so we have it on the record? 3 A. A PAC is a political action 4 committee, which were formed in the '70s by the 5 government to allow employees of companies to 6 pool their resources to help educate elected 7 officials who represent them or who have an 8 interest in learning about their business. 9 Q. And so AmerisourceBergen has a 10 PAC that it uses to make contributions to its 11 elected officials? 12 A. Yes, to -- we make a budget every 13 year and we have a PAC for it, and we have -- we 14 make contributions to elected officials. 15 Q. You mentioned that part of your 16 responsibilities were educating elected 17 officials who represent the company on the 18 business. 19 What did you mean when you said 20 that the elected officials who represent the 21 company? 22 MR. NICHOLAS: Object to the 23 form. 24 THE WITNESS: So, as I mentioned,</p>

Page 46

1 represents the cross-section of the healthcare
2 industry, so everything from hospitals,
3 pharmacies, insurers to pharmacies,
4 distributors. Basically, anybody in the
5 healthcare industry is represented or can be
6 represented in the Healthcare Leadership
7 Council.

8 Q. So it looks like you mentioned
9 hospitals, pharmacies, insurers and
10 distributors.

11 What about physicians or
12 prescribers?

13 A. Possibly. You know, like Mayo
14 Clinic is a member, and also manufacturers are
15 members and pharmacies.

16 Q. Does the Healthcare Leadership
17 Council have like committees or subgroups or
18 working groups?

19 A. They have task forces.

20 Q. Does AmerisourceBergen hold any
21 positions in the Healthcare Leadership Council?

22 A. Steve Collis is on the board, and
23 then Stacie Heller and I serve on their task
24 force committees or task forces.

Page 47

1 Q. What task forces are those?

2 A. I can't remember the names, but
3 there's one on the uninsured. I think there's
4 another one on healthcare quality.

5 Q. Is McKesson a member of the
6 Healthcare Leadership Council?

7 A. Yes.

8 Q. How about Cardinal Health?

9 A. Yes.

10 Q. Do you know which manufacturers
11 are members of the Healthcare Leadership
12 Council?

13 MR. NICHOLAS: Object to the
14 form, foundation.

15 THE WITNESS: No.

16 BY MR. CLUFF:

17 Q. Have you -- do you have any
18 understanding about Johnson & Johnson
19 participating in the Healthcare Leadership
20 Council?

21 A. I don't know.

22 Q. Do you have any understanding
23 about Mallinckrodt participating in the
24 Healthcare Leadership Council?

Page 48

1 A. I don't know.

2 Q. You mentioned pharmacies.

3 Do you know which pharmacies
4 participate in the Healthcare Leadership
5 Council?

6 A. I don't know. The membership
7 changes, and sometimes they join and then they
8 drop out, and so I don't know. At this time I
9 don't know.

10 Q. Do you have any understanding
11 about Rite Aid participating in the Healthcare
12 Leadership Council?

13 A. I don't know.

14 Q. Some of these questions I have to
15 ask just to get your understanding. I'm not
16 trying to trick you into saying yes or no, just,
17 you know, looking in all the cupboards, so to
18 speak.

19 A. Okay.

20 Q. How about Walgreens, do you know
21 in Walgreens participated in the Healthcare
22 Leadership Council?

23 A. Yes.

24 Q. How about Walmart?

Page 49

1 A. I don't know.

2 Q. How about CVS?

3 A. I don't know.

4 Q. You made an interesting point
5 about membership changing, people coming in and
6 going out.

7 I want to go back to the chain or
8 the other pharmacy memberships that
9 AmerisourceBergen has.

10 With the NACDS, do you know how
11 long AmerisourceBergen has been a member of the
12 NACDS?

13 A. No.

14 Q. You've worked at
15 AmerisourceBergen since 2004.

16 Do have a recollection of when
17 you started working with the NACDS as part of
18 your job responsibilities?

19 A. Since 2004.

20 Q. Since 2004.

21 So AmerisourceBergen potentially
22 has been a member of the NACDS since that time?

23 A. Yes.

24 Q. Do you know if Cardinal and

<p style="text-align: right;">Page 50</p> <p>1 McKesson are both members during the same time 2 period? 3 A. Yes. 4 Q. How about the NCPA, do you know 5 when AmerisourceBergen's membership started with 6 the NCPA? 7 A. Since before 2004. 8 Q. How about the Healthcare 9 Leadership Council, do you know when 10 AmerisourceBergen started participating in that 11 group? 12 A. No. 13 Q. Do you have a recollection, based 14 on your work with AmerisourceBergen, when -- 15 when that may have happened? 16 MR. NICHOLAS: Object to the 17 form. 18 THE WITNESS: I don't remember. 19 BY MR. CLUFF: 20 Q. Do you recall doing any work with 21 the Healthcare Leadership Council before you 22 became the senior vice president? 23 A. Yes. 24 Q. So sometime before 2014 then?</p>	<p style="text-align: right;">Page 52</p> <p>1 Executive Committee? 2 A. Yes. 3 Q. What are those? 4 A. Board member and Executive 5 Committee member. It's the same person. 6 Q. Who is that? 7 A. Bob Mauch. 8 Q. Does Mr. Mauch hold any special 9 positions on either the Board of Directors or 10 the Executive Committee? 11 A. I don't know. 12 Q. So you don't know whether he 13 might be a chairman of the board or a chairman 14 of the Executive Committee? 15 A. Incoming chairman. 16 Q. Of which? 17 A. The board -- I'm not sure. I 18 think he -- I should say I don't know. I know 19 he's -- 20 Q. Do you know if he's ever held a 21 position like chairman -- 22 A. No. 23 Q. -- with the Board of Directors or 24 the Executive Committee?</p>
<p style="text-align: right;">Page 51</p> <p>1 A. Yes. 2 Q. Do you know if Cardinal Health 3 was a member at that time? 4 A. I don't know. 5 Q. How about McKesson? 6 A. I don't know. 7 Q. You mentioned the HDA and the 8 HDMA. 9 Do you have any knowledge as to 10 how long AmerisourceBergen has been a member of 11 the HDA or the HDMA? 12 A. Since before 2004. 13 Q. Do you have any knowledge about 14 which employees for AmerisourceBergen 15 participate in the HDA? 16 A. There's quite a few. 17 Q. So I don't want to quiz you on 18 every single one of them, but let's talk about 19 some highlights, and maybe we work our way from 20 the top down at the HDA. 21 So the HDA has a Board of 22 Directors and an Executive Committee. Does 23 AmerisourceBergen hold any positions with the 24 HDA on either the Board of Directors or the</p>	<p style="text-align: right;">Page 53</p> <p>1 A. He has not. 2 Q. Okay. Before Mr. Mauch served on 3 the Executive Committee, do you know who held 4 positions for AmerisourceBergen on the Executive 5 Committee? 6 A. Dave Yost, Steve Collis, Dave 7 Neu. 8 Q. Who is Dave Yost? 9 A. Our former CEO. 10 Q. Do you know when he sat on the 11 Executive Committee? 12 A. Since before 2004 until he left 13 the company, which was 2010. 14 Q. Is that a guess or your best 15 estimate? 16 A. That's my best estimate. 17 Q. Okay. Who is Steve Collis? 18 A. Our chair -- AmerisourceBergen's 19 chairman, CEO and president. 20 Q. Do you know when he held a 21 position on the Executive Committee of the HDA? 22 A. I don't remember the exact years. 23 Q. Was it before or after Mr. Yost? 24 A. After.</p>

<p style="text-align: right;">Page 54</p> <p>1 Q. So sometime after 2010?</p> <p>2 A. Yes. No. I don't remember.</p> <p>3 Q. Who is David Neu?</p> <p>4 A. Former president of the company.</p> <p>5 Q. And his last name is spelled</p> <p>6 N-e-u, correct?</p> <p>7 A. Yes.</p> <p>8 Q. Do you know when he held a</p> <p>9 position on the Executive Committee of the HDA?</p> <p>10 A. I don't remember the exact years.</p> <p>11 Q. Do you know if it was before or</p> <p>12 after Mr. Collis?</p> <p>13 A. After Mr. Collis.</p> <p>14 Q. Do you know how long Mr. Neu</p> <p>15 served on the Executive Committee of the HDA?</p> <p>16 A. Approximately four years.</p> <p>17 Q. Do you know when Bob Mauch</p> <p>18 started holding a position on the Executive</p> <p>19 Committee of the HDA?</p> <p>20 A. I don't know.</p> <p>21 Q. How about the Board of Directors,</p> <p>22 do you know if Dave Yost ever held a position on</p> <p>23 the Board of Directors for the HDA?</p> <p>24 A. I don't know.</p>	<p style="text-align: right;">Page 56</p> <p>1 the primary members as part of that.</p> <p>2 Q. You've referred to manufacturers</p> <p>3 a couple times as customers of</p> <p>4 AmerisourceBergen.</p> <p>5 What do manufacturers purchase</p> <p>6 from AmerisourceBergen that would make them</p> <p>7 customers?</p> <p>8 MR. NICHOLAS: Object to the</p> <p>9 form.</p> <p>10 THE WITNESS: We purchase</p> <p>11 pharmaceuticals from manufacturers.</p> <p>12 They don't purchase from us.</p> <p>13 BY MR. CLUFF:</p> <p>14 Q. I'm just trying to understand the</p> <p>15 words "they" you're using today, so I'm going to</p> <p>16 ask the question a little bit differently.</p> <p>17 You've referred to manufacturers</p> <p>18 multiple times as customers of</p> <p>19 AmerisourceBergen. How are manufacturers</p> <p>20 customers of AmerisourceBergen, in your</p> <p>21 understanding?</p> <p>22 MR. NICHOLAS: Object to the</p> <p>23 form.</p> <p>24 Go ahead.</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. And how about Mr. Collis, do you</p> <p>2 know if he held a position on the Board of</p> <p>3 Directors of the HDA?</p> <p>4 A. I don't know.</p> <p>5 Q. How about David Neu, did he ever</p> <p>6 hold a position with the HDA?</p> <p>7 A. Chairman.</p> <p>8 Q. Was Mr. Neu ever a chairman of</p> <p>9 the Executive Committee of the HDA?</p> <p>10 A. Chairman of the board.</p> <p>11 Q. Are you generally familiar with</p> <p>12 the membership of the HDA?</p> <p>13 A. Yes.</p> <p>14 Q. Do you know if manufacturers are</p> <p>15 member of the HDA?</p> <p>16 A. Manufacturers have some sort of</p> <p>17 subsidiary or associate type of membership, but</p> <p>18 it's not policy making or it's sort of, as I</p> <p>19 said, subsidiary committee almost.</p> <p>20 Q. What do you mean by that?</p> <p>21 A. I just -- I think they just, as</p> <p>22 a -- as a customer and a part of the supply</p> <p>23 chain, they have some kind of minor membership,</p> <p>24 but we don't interact with them, I mean meaning</p>	<p style="text-align: right;">Page 57</p> <p>1 THE WITNESS: We purchase</p> <p>2 pharmaceuticals from manufacturers, and</p> <p>3 we aggregate them and distribute them</p> <p>4 anywhere in the country.</p> <p>5 BY MR. CLUFF:</p> <p>6 Q. So that makes AmerisourceBergen a</p> <p>7 customer of manufacturers, correct?</p> <p>8 MR. NICHOLAS: Object to the</p> <p>9 form. Word bickering.</p> <p>10 THE WITNESS: We view them as a</p> <p>11 customer, but I guess it's up to you how</p> <p>12 you want to...</p> <p>13 BY MR. CLUFF:</p> <p>14 Q. It's not up to me. These are</p> <p>15 your words. I'm just trying to understand them.</p> <p>16 A. We view them as a customer.</p> <p>17 Q. Why?</p> <p>18 A. Because we purchase</p> <p>19 pharmaceuticals from them.</p> <p>20 Q. Are you aware if</p> <p>21 AmerisourceBergen is selling anything to</p> <p>22 manufacturers?</p> <p>23 A. No.</p> <p>24 Q. Are you aware if</p>

Page 86

1 A. No. I mean, other members
2 might -- we fill in for each other in our
3 Washington office, but that's it.
4 Q. You mean other members of
5 AmerisourceBergen?
6 A. If somebody -- if Stacie can't be
7 on, somebody might fill in for her.
8 Q. I think you mentioned that Steve
9 Collis holds a board position with the
10 Healthcare Leadership Council; is that right?
11 A. Yes.
12 Q. Do you know if he attends Board
13 of Directors meetings?
14 A. When he can.
15 Q. Do you know how often those are
16 held?
17 A. Three times a year.
18 Q. Do you have an approximation of
19 how often he is able to attend?
20 A. Once or twice a year.
21 Q. Do you know if Cardinal Health
22 holds a Board of Directors position on the
23 Healthcare Leadership Council?
24 A. No. They did.

Page 87

1 Q. At what time period did they hold
2 that position?
3 A. 2015 to 2017.
4 Q. Do you know if their board member
5 attended Board of Directors meetings?
6 A. Yes.
7 Q. Do you know who their Board of
8 Directors member was?
9 A. George Barret.
10 Q. Do you know if McKesson has ever
11 held a board position on the Healthcare
12 Leadership Council?
13 A. Yes.
14 Q. Do you know how long they held
15 that position?
16 A. Approximately two years.
17 Q. So since 2016?
18 A. No, it was before. So it would
19 have been 2013 to 2015, I guess, approximately.
20 Q. Do you know if McKesson's board
21 member with the Healthcare Leadership Council
22 have attended board meetings?
23 A. Yes.
24 Q. Do you know who their Board of

Page 88

1 Directors representative was?
2 A. John Hammergren.
3 Q. Can you spell the last name?
4 A. H-a-m-m-e-r-g-r-e-n.
5 Q. Do you know if any pharmaceutical
6 manufacturers held board of director's positions
7 in the Healthcare Leadership Council?
8 A. I don't -- I don't know.
9 Q. How about any pharmacies, like
10 chain pharmacies?
11 A. I don't know.
12 Q. Turning to the HDA now, I know
13 that AmerisourceBergen's overall involvement in
14 HDA is probably larger than you may know about,
15 so I'm just going to confine it to your work in
16 the government affairs and public policy group.
17 Do you know how frequently your
18 staff in the government affairs and public
19 policy group attend HDA meetings?
20 MR. NICHOLAS: Object to the form
21 of the question, particularly the
22 characterization at the beginning of the
23 question.
24 Go ahead. You can answer.

Page 89

1 THE WITNESS: They're usually
2 phone calls, and some are weekly, some
3 are monthly.
4 BY MR. CLUFF:
5 Q. What are some of the weekly calls
6 that your staff participate in with the HDA?
7 A. The Federal Government Affairs
8 Committee and the State Government Affairs
9 Committee.
10 Q. Are those calls held separately?
11 A. Yes.
12 Q. So between the Federal Government
13 Affairs Committee and the State Government
14 Affairs Committee, people that you work with at
15 AmerisourceBergen are in at least two HDA calls
16 a week, correct?
17 A. Yes. I mean, there are times
18 where there's -- when Congress isn't in session
19 they might lapse, but, generally, it's once a
20 week.
21 Q. Are there any other weekly calls
22 that you can remember?
23 A. No.
24 Q. How about the Public Policy

<p style="text-align: right;">Page 318</p> <p>1 Q. And Julie Eddy writes, "We like 2 to say what we are 'for' instead of only 3 against. We want to totally kill the opioid tax 4 bills by pointing to our support of other 5 bills." 6 Do you see that? 7 A. Yes. 8 Q. So Ms. Eddy believed it was 9 AmerisourceBergen's policy to say what they were 10 for so they could kill things they were against, 11 right? 12 MR. NICHOLAS: Object to the 13 form. 14 THE WITNESS: I have no idea why 15 she said that. I mean, she was prone to 16 saying irresponsible things. 17 BY MR. CLUFF: 18 Q. Did you reply back and say, 19 Julie, that's an irresponsible thing to say? 20 A. No, but I probably told her that. 21 Q. But it's not in this e-mail, 22 right? 23 A. No. 24 Q. Did you write her an e-mail about</p>	<p style="text-align: right;">Page 320</p> <p>1 Q. Before today's deposition, did 2 you have an opportunity to look for some notes 3 that you took during Mr. Collis' testimony 4 before the Energy and Commerce committee? 5 A. Yes. 6 Q. Okay. I reviewed some of your 7 documents and I don't want to misrepresent the 8 way that you conduct business, but I notice that 9 you do keep notes sometimes on documents. 10 Is that a part of your practice 11 as a AmerisourceBergen employee? 12 A. Occasionally, yes. 13 Q. Is there any particular reason 14 why for the hearing in which Mr. Collis 15 testified that you decided to keep notes? 16 A. Just in case there was any 17 follow-up or anything. 18 Q. Okay. We talked today about a 19 lot of other meetings and phone calls that you 20 would have been a participant in over time. 21 Would it have been your practice 22 to keep notes during any of those meetings or 23 during those phone calls? 24 A. When?</p>
<p style="text-align: right;">Page 319</p> <p>1 it? 2 A. No, I don't remember this. 3 MR. CLUFF: It's about 5:00, so 4 we've been going another little bit of 5 an hour. Why don't we take a break. 6 Let's come back maybe quick, though, 7 from the break, and then I'll see if I 8 have anything else. I know there's like 9 just a couple more documents I want to 10 talk to you about and then just a few 11 like general, and then I think I'm going 12 to be done with the questioning for 13 today. 14 THE WITNESS: Okay. 15 MR. NICHOLAS: Okay. 16 THE VIDEOGRAPHER: Off the 17 record, 5:00. 18 (Brief recess.) 19 THE VIDEOGRAPHER: We are back on 20 the record 5:14 p.m. 21 BY MR. CLUFF: 22 Q. Ms. Norton, you're still under 23 oath so we'll proceed. 24 A. Okay.</p>	<p style="text-align: right;">Page 321</p> <p>1 Q. Any time between 2004 and today. 2 MR. NICHOLAS: Object to the 3 form. 4 THE WITNESS: It's possible. 5 BY MR. CLUFF: 6 Q. I'm not trying to get you to 7 recall specific instances where you may have 8 kept notes. 9 I'm just wondering just as a 10 general practice, do you keep notes about the 11 meetings and phone calls that you participate 12 in? 13 MR. NICHOLAS: Object to the 14 form. 15 THE WITNESS: Yes, but never 16 extensive. I'm just usually a few -- a 17 few notes jotted to me for my own 18 memory. 19 BY MR. CLUFF: 20 Q. Okay. Where would you keep those 21 notes, if they existed? 22 A. Sometimes I write them on the 23 documents that are in front of me. Sometimes I 24 write them on envelopes. Sometimes I write them</p>